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SOAH DOCKET NO. 473-19-6862
PUC DOCKET NO. 49737

APPLICATION OF SOUTHWESTERN § BEFORE THE STATE OFFICE
ELECTRIC POWER COMPANY FOR §
CERTIFICATE OF CONVENIENCE §
AND NECESSITY AUTHORIZATION § OF
AND RELATED RELIEF FOR THE §
ACQUISITION OF WIND §
GENERATION FACILITIES § ADMINISTRATIVE HEARINGS

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TEXAS INDUSTRIAL ENERGY CONSUMERS'
FIFTEENTH REQUEST FOR INFORMATION TO SWEPCO

Pursuant to 16 T.A.C. § 22.144, Texas Industrial Energy Consumers ("TIEC") requests that Southwestern Electric Power Company ("SWEPCO") provide all of the information requested in Exhibit "A" within the time frame specified under the procedural rules.

Pursuant to 16 T.A.C. § 22.144(c)(2), TIEC further requests that answers to the requests for information be made under oath. Each answer should identify the person responsible for preparing that answer (other than the purely clerical aspects of its preparation) and the name of the witness in this proceeding who will sponsor the answer and who can vouch for its accuracy. In producing documents pursuant to this request for information, please indicate the specific request(s) to which the document is being produced. These requests are continuing in nature, and should there be, for any reason, a change in circumstances which would modify or change an answer supplied by you, such changed answer should be submitted immediately as a supplement to your original answer pursuant to 16 T.A.C. § 22.144(i). Please answer each request and sub-request in the order in which they are listed and in sufficient detail to provide a complete and accurate answer to the request. TIEC further requests that each item of information be made available as it is completed, rather than upon compilation of all information requested.

All information responsive to the requests on the attached Exhibit "A" should be sent to the following persons via overnight courier, on a piecemeal basis as individual items become available:

Mr. Rex D. VanMiddlesworth
Mr. Benjamin B. Hallmark
Mr. James Z. Zhu
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DEFINITIONS AND INSTRUCTIONS

A. “SWEPCO” refers to Southwestern Electric Power Company, and its affiliates, subsidiaries, and any person acting or purporting to act on their behalf, as it relates to the true-up proceeding and related appeals, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.

B. “AEP” refers to American Electric Power, and its affiliates, subsidiaries, and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.

C. The terms “document” or “documents” are used in their broadest sense to include, by way of illustration and not limitation, all written or graphic matter of every kind and description whether printed, produced or reproduced by any process whether visually, magnetically, mechanically, electronically or by hand, whether final or draft, original or reproduction, whether or not claimed to be privileged or otherwise excludable from discovery, and whether or not in your actual or constructive possession, custody, or control. The terms include writings, correspondence, telegrams, memoranda, studies, reports, surveys, statistical compilations, notes, calendars, tapes, computer disks, data on computer drives, e-mail, cards, recordings, contracts, agreements, invoices, licenses, diaries, journals, accounts, pamphlets, books, ledgers, publications, microfilm, microfiche and any other data compilations from which information can be obtained and translated, by you if necessary, into reasonably usable form. “Document” or “documents” shall also include every copy of a document where the copy contains any commentary or notation of any kind that does not appear on the original or any other copy.

D. Pursuant to Rule 196.4 of the Texas Rules of Civil Procedure, TIEC specifically requests that any electronic or magnetic data (which is included in the definition of “document”) that is responsive to a request herein be produced on CD-Rom in a format that is compatible with Microsoft, Macintosh and/or Word Perfect and be produced with your response to these requests. If emails are responsive to these requests, please provide a printed copy of the entire email string. Attachments to emails should be printed or, if the attachment is an Excel or other similar file, should be provided in native format on CD-Rom.

E. The terms “and” and “or” shall be construed both disjunctively and conjunctively as necessary to make the request inclusive rather than exclusive.

F. “Each” shall be construed to include the word “every” and “every” shall be construed to include the word “each.”

G. “Any” shall be construed to include “all” and “all” shall be construed to include “any.”

H. The term “concerning,” or one of its inflections, includes the following meanings: relating to; referring to; pertaining to; regarding; discussing; mentioning; containing; reflecting; evidencing; describing; showing; identifying; providing; disproving; consisting of; supporting; contradicting; in any way legally, logically or factually connected with the matter to which the term refers; or having a tendency to prove or disprove the matter to which the term refers.

I. The term “including,” or one of its inflections, means and refers to “including but not limited to.”

J. “Relate to,” “regarding,” “concerning” and similar terms mean addressing, analyzing, referring, discussing, mentioning in any way, explaining, supporting, describing, forming the basis for, or being logically or causally connected in any way with the subject of these discovery requests.

K. “Provide the basis,” “state the basis,” or “explain the basis” means provide all information on or describe every fact, statistic, inference, estimate, consideration, conclusion, study, and analysis known to SWEPCO that was relied upon in support of the expressed contention, proposition, conclusion or statement.

L. Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.

M. The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.

N. If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients of copies, subject matter of the document, and the basis upon which such privilege is claimed.

O. Pursuant to P.U.C. Proc. R. 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.

P. If the information requested is included in previously furnished exhibits, workpapers, and responses to other discovery inquiries or otherwise, in hard copy or electronic format, please furnish specific references thereto, including Bates Stamp page citations and detailed cross-references.

Q. The term “emails” includes the entire email string and all attachments found anywhere within the email string. Please refer to paragraph “D.” regarding specific instructions for producing such items.


R. “Communications” refers to correspondence of any kind, including emails.

S. “Identify” and “describe” shall have the meaning set forth below according to the context in which the term is used:

- i. When used in reference to an individual, shall mean to state his or her full name, present or last known residence address, business affiliation and business address, and residence and business telephone number;
- ii. When used in reference to a corporation, shall mean to state its full name, its state of incorporation, its address and its principal place of business;
- iii. When used in reference to any entity other than an individual or corporation, shall mean to state its official name, its organizational form and its address;
- iv. When used in reference to a document, shall mean to state the type of document, date, author, addressee, title, its present location, the name and address of its custodian, and the substance of the contents thereof. In lieu of identifying any document, copies thereof may be furnished; and
- v. When used in reference to a communication, shall mean to state the form of the communication (e.g., telephone conversation, letter, telegram, teletype, telecopy, written memorandum, face to face conversation, or any other form), the date of the communication or the dates on which the communication was sent and/or received if not the same, the parties to the communication, the party who initiated it, the substance of the communication, and the present location and the name and address of the custodian if the communication was non-verbal and/or of any written memorialization of the communication.

Respectfully submitted,

THOMPSON & KNIGHT LLP

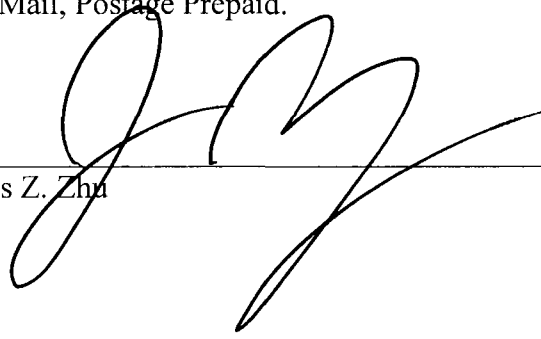


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**ATTORNEYS FOR TEXAS INDUSTRIAL
ENERGY CONSUMERS**

CERTIFICATE OF SERVICE

I, James Z. Zhu, Attorney for TIEC, hereby certify that a copy of the foregoing document was served on all parties of record in this proceeding on this 13th day of February, 2020 by facsimile, electronic mail and/or First Class, U.S. Mail, Postage Prepaid.



James Z. Zhu

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TIEC 15-1 To the extent not already provided, please provide all supporting workpapers and all documents cited or relied upon in the rebuttal testimonies of all SWEPCO witnesses.

TIEC 15-2 Referring to the Rebuttal Testimony of John F. Torpey at 7, please confirm that the year-by-year breakeven power prices shown on Errata Testimony Exhibit 1 do not reflect the year-by-year differences in costs and benefits of the Wind Facilities (e.g., it does not account for PTCs only being generated in the first ten years, or the revenue requirement declining over time). If confirmed, please provide the year-by-year breakeven power prices that do reflect the year-by-year differences in costs and benefits of the Wind Facilities.

The following questions refer to Mr. Bletzacker's rebuttal testimony:

TIEC 15-3 Please provide Mr. Bletzacker's understanding of how the CME Group derives its "system-generated price" as referenced on page 4 of his rebuttal testimony.

TIEC 15-4 Referring to page 11 of Mr. Bletzacker's rebuttal testimony, please identify the area represented by the ICE SPP South Hub and the area represented by the Company's referenced SPP Central Zone. Please provide any analysis SWEPCO or AEP has conducted comparing the locational marginal prices in these areas.

TIEC 15-5 Referring to page 15 of Mr. Bletzacker's rebuttal testimony, please explain how the Aurora model is "back-tested to benchmark its accuracy against history." Please provide all such analyses back-testing the referenced model conducted over the last five years.

TIEC 15-6 Referring to the chart on page 21 of Mr. Bletzacker's rebuttal testimony, please provide the forecaster's description of each third-party forecast listed (other than EIA), including any assumptions that the forecaster provides with each forecast.

TIEC 15-7 Referring to figure 9 on page 20 of Mr. Bletzacker's rebuttal testimony:

- a. Please explain as to each of the third-party forecasts referenced in this analysis whether the forecasts is a base case, low case, or high case.
- b. For each of the third-party forecasts used in this analysis, please provide all assumptions and narrative descriptions provided by each of the third-party forecasters.
- c. Please provide a calculation of the levelized price of each of the third-party forecasts over the 2021-2051 period using the same methodology that Mr. Bletzacker used to calculate the levelized breakeven price of \$3.67/MMBtu. If a third-party forecast's gas prices need to be trended beyond the last year provided by the forecast, please state what methodology was used to trend the forecast's gas prices.

TIEC 15-8 Please confirm that the year-by-year breakeven gas prices shown on Exhibits 9 and 10 do not reflect the year-by-year differences in costs and benefits of the Wind Facilities (e.g., it does not account for PTCs only being generated in the first ten years, or the revenue requirement declining over time). If confirmed, please provide the year-by-year breakeven gas prices that do reflect the year-by-year differences in costs and benefits of the Wind Facilities.

TIEC 15-9 Referring to page 24-25 of Mr. Bletzacker's rebuttal testimony, please provide the full documents of the referenced earnings call transcripts and a copy of the referenced S&P Global Market Intelligence publication.

TIEC 15-10 Referring to page 27 of the Direct Testimony of Karl R. Bletzacker, please provide a detailed explanation, including providing what the specific assumptions are in each of the cases, of how the assumptions differ between the Company's High, Low, and Base case scenarios. In responding, please reconcile the response with the explanation Mr. Bletzacker provided in response to TIEC 1-4 regarding the methodology for calculating the High and Low case.

TIEC 15-11 Referring to page 27 of the Direct Testimony of Karl R. Bletzacker, please provide the amount of electric generation demand assumed for each year in the High, Low, and Base cases.

TIEC 15-12 Has AEP conducted a study or analysis to analyze the impact of weather on the accuracy of its Fundamentals Forecasts? If so, please provide any such studies or analyses.